

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

ENCORE RECEIVABLE
MANAGEMENT, INC.

CASE NO. 1:12-CV-297

CONVERGYS CUSTOMER
MANAGEMENT GROUP, INC.

Judge Herman J. Weber
Magistrate Judge Karen L. Litkovitz

Plaintiffs

vs

ACE PROPERTY AND CASUALTY
INSURANCE COMPANY

**STIPULATION OF EXTENSION OF
TIME TO MOVE OR PLEAD FOR
DEFENDANTS DISCOVER
PROPERTY AND CASUALTY
INSURANCE COMPANY AND ST.
PAUL FIRE AND MARINE
INSURANCE COMPANY**

AMERICAN GUARANTEE INSURANCE
COMPANY

AMERICAN HOME INSURANCE
COMPANY

CONTINENTAL CASUALTY COMPANY

DISCOVER PROPERTY AND
CASUALTY INSURANCE COMPANY

FEDERAL INSURANCE COMPANY

ST. PAUL FIRE AND MARINE
INSURANCE COMPANY

Defendants

Pursuant to Local Rule 6.1 of the United States District Court for the Southern District of Ohio, the parties hereby agree and stipulate that Defendants Discover Property and Casualty Insurance Company and St. Paul Fire and Marine Insurance Company shall have an additional twenty-one (21) days in which to move or plead in response to Plaintiffs' Complaint. Defendants Discover Property and Casualty Insurance Company and St. Paul Fire and Marine

Insurance Company's new response date is May 25, 2012. There have been no prior stipulated extensions.

So stipulated:

/s/ James E. Arnold per authorization
James E. Arnold 0037712
JAMES E. ARNOLD & ASSOCIATES
115 West Main Street, 4th Floor
Columbus, OH 43215
(614) 460-1600 phone
(614) 469-1066 fax
mburkart@arnlaw.com

Attorney for Plaintiffs

/s/ R. Gary Winters
R. Gary Winters 0018680
Bernard W. Wharton 0063487
McCASLIN, IMBUS & McCASLIN
632 Vine Street, Suite 900
Cincinnati, OH 45202
(513) 421-4646 phone
(513) 421-7929 fax
rgwinters@mimlaw.com
bwwharton@mimlaw.com

*Attorneys for Defendants Discover
Property and Casualty Insurance Company
and St. Paul Fire and Marine Insurance
Company*

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of May, 2012 , a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ R. Gary Winters
R. Gary Winters 0018680
Bernard W. Wharton 0063487
McCASLIN, IMBUS & McCASLIN
632 Vine Street, Suite 900
Cincinnati, OH 45202
(513) 421-4646 phone
(513) 421-7929 fax
rgwinters@mimlaw.com
bwwharton@mimlaw.com

*Attorneys for Defendants Discover Property and
Casualty Insurance Company and St. Paul Fire
and Marine Insurance Company*

